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Attorney for Defendant
IGNACIO VALENCIA

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

IGNACIO VALENCIA,

Defendant.

CASE NO. 2:25-cr-00016-JAM

**FOURTH STIPULATION AND ORDER TO
CONTINUE STATUS CONFERENCE AND
EXCLUDE TIME**

TIME: 9:00 a.m.
COURT: Hon. John A. Mendez

STIPULATION

1. By previous order, this matter was set for status on August 5, 2025.
2. By this stipulation, defendant now moves to **continue** the **status conference** until **September 09, 2025, at 09:00 a.m.**, and to exclude time between August 5, 2025, and September 09, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has produced discovery associated with this case which includes 17 GB of data, multiple BWC and dash cam videos and several hundred pages.
 - b) Counsel for defendant continues to review the discovery, to review the charges and potential responses to the charges with her client, to conduct factual investigation and legal research, and to otherwise prepare for trial.

1 c) Counsel for defendant believes that failure to grant the above-requested
2 continuance would deny her the reasonable time necessary for effective preparation, taking into
3 account the exercise of due diligence.

4 d) The government does not object to the continuance.

5 e) Based on the above-stated findings, the ends of justice served by continuing the
6 case as requested outweigh the interest of the public and the defendant in a trial within the
7 original date prescribed by the Speedy Trial Act.

8 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
9 et seq., within which trial must commence, the time period of August 5, 2025 to September 09,
10 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
11 T4] because it results from a continuance granted by the Court at defendant's request on the basis
12 of the Court's finding that the ends of justice served by taking such action outweigh the best
13 interest of the public and the defendant in a speedy trial.

14 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
15 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
16 must commence.

17 IT IS SO STIPULATED.

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19
20 Dated: July 25, 2025

/s/ Shari Rusk
Shari Rusk
Counsel for Defendant
IGNACIO VALENCIA

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22
23
24 Dated: July 25, 2025

MICHELE BECKWITH
Acting United States Attorney

25
26 /s/ Nicole Vanek
27 Nicole Vanek
28 Assistant United States Attorney

ORDER

IT IS SO ORDERED.

Dated: July 28, 2025

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE